

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 2:19-cr-003
)	
VINCENT SANDERS)	

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR
AMENDMENT OF HIS CONDITIONS FOR PRETRIAL RELEASE**

The United States of America, by and through Bobby L. Christine, United States Attorney for the Southern District of Georgia, and the undersigned Assistant United States Attorney, files its response to Defendant's Motion for Amendment of His Conditions for Pretrial Release:

1. On January 8, 2019, a federal Grand Jury returned an Indictment against Defendant Vincent Sanders charging him with violations of Title 18, United States Code, Sections 2252A. Doc. 1.
2. On February 12, 2019, Defendant Sanders was released pretrial with certain conditions. Doc. 21.
3. On February 25, 2019, Defendant Sanders filed a motion requesting this Honorable Court to modify his conditions of pre-trial release. Doc. 26. Specifically, Defendant Sanders states that the curfew imposed interferes with his ability to work the night shift three to five days per week as this Honorable Court imposed a curfew from 10:00PM to 6:00AM. Doc. 21.
4. Under Title 18, United States Code, Section 3142(c)(1)(B), in any case that involves a minor victim, any release order shall contain, at a minimum, the

- condition of electronic monitoring and each of the conditions listed in certain subparagraphs, to include the condition to comply with a specified curfew. *See* 18 U.S.C. 3142.
5. Defendant Sanders' case involves a minor and violations of federal law which trigger such conditions. *See* Doc. 1; 18 U.S.C. 3142.
6. The Government submits that Defendant Sanders' condition of curfew continue to be imposed. Nevertheless, the Government does not oppose a modification to allow his employment hours provided that U.S. Probation confirm the information contained in Exhibit A (Doc. 26) and that Defendant Sanders submit to U.S. Probation proof of his continued work schedule and actual presence at work.
7. WHEREFORE, the Government respectfully states it has no opposition to Defendant's Motion but requests that curfew continue to be a condition that is modified only to allow Defendant Sanders to work three to five days a week with proof of work schedule.

This 25th day of February 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

Submitted this 25th day of February 2019.

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